

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LIQUIDX, INC.,

Plaintiff,

v.

BROOKLAWN CAPITAL, LLC,
BROOKLAWN CAPITAL FUND, LLC, and
BROOKLAWN CAPITAL FUND II, LP

Defendants.

Civil Action No. 16-cv-5528-WHP

**PLAINTIFF'S DEPOSITION DESIGNATIONS AND OBJECTIONS TO
DEFENDANTS' DEPOSITION DESIGNATIONS**

Plaintiff LiquidX, Inc. ("LiquidX") hereby submits: (1) designations of deposition testimony that it intends to offer at the November 14 hearing in this matter; (2) counter-designations to the deposition testimony designated by Defendants Brooklawn Capital LLC, Brooklawn Capital Fund LLC, and Brooklawn Fund II, LP (collectively "Brooklawn"); and (3) objections to the deposition testimony designated by Brooklawn.

I. Kimberly Russell

a. Designations

11:25–12:7

19:3–14

20:1–4

21:3–22:13

23:6–21

24:25–25:2

26:14–27:1

28:24–29:7

31:14–22

34:21–35:8

35:15–21

35:23–36:7

38:16–41:5
42:5–11
42:13–19
42:22–24
43:1–20
45:20–21
45:23–46:1
46:3–15
47:24–48:20
53:2–7
53:15–54:4
55:3–56:24
57:6–9
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72:8–73:21
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76:8–80:6
87:3–6
87:8–88:5
88:7–8
88:10
89:3–4
89:6
102:24:103:1
103:3–5
158:11–13

b. Counter-Designations

97:1–4
118:14
120:13–20
121:7–9
128:6–9
144:4–12
144:20–145:22
148:2–16
148:20–149:25
154:8–156:10
158:7–10

c. Objections

Excerpts of relevant pages of the transcript with objections identified in the margin are attached hereto as Exhibit A.

II. Peter Sullivan

a. Designations

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19:13–20:13
21:22–22:5
22:7–23
23:22–24:13
26:17–19
26:23–27:10
28:19–29:4
29:16–30:21
31:18–20
31:22–32:19
33:16–21
40:6–14
41:6–42:20
43:11–44:9
45:21–46:7
46:9–10
46:16–22
46:24–47:1
47:3–48:1
48:3–17
48:19–49:14
49:20–50:13
50:15–18
50:20–23
50:25–51:2
51:4–8
52:8–10
53:6–25
54:2–4
55:24–56:1
56:3–6
56:8–14
57:14–21
58:11–24
61:1–8

62:9-17
62:19-24
63:1
64:17-19
64:21-25
65:2-3
70:5-8
70:10-71:3
71:5-71:14
71:16-19
72:6-8
72:10-13
72:15-73:1
73:6-15
74:23-76:13
76:15-77:3
78:11-13
78:15-20
78:22-79:22
80:7-12
80:14-18
80:20-82:10
82:16-18
83:5-9
84:17-18
85:2-86:16
86:19-87:15
91:12-22
91:24-92:4
93:13-94:5
95:8-17
96:9-21
96:23
97:1-98:19
100:2-17
102:8-12
102:14-19
102:24-103:1
103:3
104:20-105:6
106:10-16
107:21-108:9
108:17-24
109:3-9
109:11-23
109:25-110:3

110:5–11
110:23–111:1
111:3
114:21–117:5
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b. Counter-Designations

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59:12–17
137:5–7
192:18–17
194:2–19
198:5–199:4

c. Objections

Excerpts of relevant pages of the transcript with objections identified in the margin are attached hereto as Exhibit B.

III. Barry Cohen

a. Designations

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11:14–22
12:4–10
12:18–21
15:25–16:4
17:2–5
17:17–18:5
18:10–11
18:15–18
18:20–25
19:8–20:1
20:6–8
20:10–12
20:19–21:9
21:11
22:23–25
23:4
25:16–26:5
27:10–25
30:2–8

31:10–34:13
35:1–8
35:10
35:12–14
35:19–20
35:22–36:5
36:24–37:1
39:14–20
40:7–41:8
41:11–12
42:11–12
42:17–20
43:2–6
43:8
45:23–46:9
46:11–24
47:1
56:19–25
59:7–17
61:24–62:2
68:10–23
72:4–12
72:16–73:7
73:12–15
73:20–74:9

b. Counter-Designations

none

c. Objections

Excerpts of relevant pages of the transcript with objections identified in the margin are attached hereto as Exhibit C.

IV. James Counihan

a. Designations

10:19–24
17:8–14
17:17–19
18:15–19:12
30:14–16
36:25–37:7
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54:7-11
65:1-66:5
67:4-68:16
68:24-69:1
69:2-14
72:14-21
73:16-74:13
74:17-77:15
77:18-78:19
79:6-19
79:22-81:8
88:15-20
107:12-108:9
113:20-24
114:3-4
124:18-21
125:2-7
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126:18-127:10
128:17-19
128:22-130:2
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159:21-23
161:14-16
161:19-162:4
162:8-20
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166:5-10
166:12-19
171:12-24
173:13-174:17
175:5-8
176:8-177:23
179:18-180:4
181:25-182:21

b. Counter-Designations

118:5-8
118:12-14
118:18-119:7
136:7-13
157:2-158:5

c. Objections

Excerpts of relevant pages of the transcript with objections identified in the margin are attached hereto as Exhibit D.

Dated: November 13, 2016

Respectfully submitted,

LIQUIDX, INC.,

By its attorneys

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Certificate of Service

I, Michael J. Licker, certify that on November 13, 2016, I caused a copy of the foregoing document to be served on counsel for defendants via the Court's CM/ECF system.

/s/ Michael J. Licker
Michael J. Licker